



Calorie Control Council

P-63802

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February 11, 1998

Mr. Joseph Levitt
Director
Center for Food Safety and Applied Nutrition
Food and Drug Administration
HFS-001
200 C Street
Washington, DC 20204

RE: Request for Confirmation that the FDA Does Not Object to
the Use of the Term Polyols in Lieu of Sugar Alcohols

Dear Mr. Levitt:

In 1995, the Calorie Control Council submitted a Citizen Petition (Docket No. 95P0099) to the Food and Drug Administration requesting that the Commissioner revise 21 CFR 101.9(c)(6)(iii) by replacing the term "sugar alcohol" with the term "polyol." The Council's petition noted that the use of the term "polyol" would reduce consumer confusion.

To support this, the Council submitted a nationally projectable consumer survey conducted for the Calorie Control Council by Market Facts in 1995. This research found that 78 percent of those surveyed think the term "sugar alcohol" indicates a product contains some sugar even when the product is labeled "sugar free." Sixty-nine percent believe the product contains some alcohol. Further to the petition, the Council provided evidence to confirm that health professionals also are confused. In a survey of 130 diabetes educators conducted at the 1997 American Association of Diabetes Educators Annual Meeting, 44% of respondents had no answer when asked "what does the term sugar alcohol mean to you?" Three respondents said "sorbitol" and no other response was given by more than two individuals. Other responses included "alcohol based sugar," "metabolizes like alcohol" and "big problem for patients because they don't understand about it." The Council also reported a call received from a detoxification clinic staff member asking if "sugar alcohols" can be used by recovering alcoholics. In addition, at the Council's meeting last October with you and other FDA representatives, a Council member noted the difficulty when trying to export to Muslim countries products bearing the term "sugar alcohol" on the label.

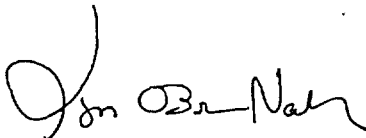
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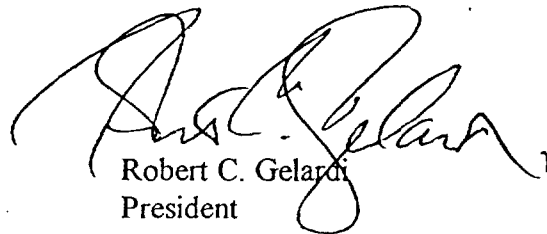
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The Council understands and appreciates the immensity of FDA's workload and limited resources. The Council would, therefore, appreciate confirmation that the Food and Drug Administration has no objection to the Calorie Control Council advising its members that they may use the term "polyols" in lieu of the term "sugar alcohols" until such time that the FDA can complete its regulatory review of the Council's petition and amend 21 CFR 101.9(c)(6)(iii) by replacing the term "sugar alcohol" with the term "polyol."

Respectfully submitted,



Lyn O'Brien Nabors
Executive Vice President



Robert C. Gelardi
President

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